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Chief Magistrate Judge James P. Donohue

JAN 23 2018

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,
v.
PAUL STUART BRUNT and
RAWND KHALEEL ALDALAWI,
Defendants.

CASE NO.

MJ18-031

COMPLAINT for VIOLATION

Title 18, U.S.C. Section 371

BEFORE, James P. Donohue, Chief United States Magistrate Judge, U. S.
Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE
(Conspiracy to Violate the Arms Export Control Act)

Beginning at a time unknown, but not later than October 5, 2016, and continuing until on or about November 27, 2017, at Bellevue, within the Western District of Washington, and elsewhere, PAUL STUART BRUNT, RAWND KHALEEL ALDALAWI, and other persons known and unknown, knowingly and intentionally did conspire to willfully export defense articles designated on the United States Munitions List, International Traffic in Arms Regulations, from the United States to Turkey and Iraq, without having obtained from the United States Department of State a license or

1 written approval for the export of these defense articles, in violation of the Arms Export
2 Control Act, Title 22, United States Code, Section 2778(b)(2), and Title 22, Code of
3 Federal Regulations, Sections 121.1, 123.1, and 127.1(a).

4 **A. Background Law**

5 1. The Arms Export Control Act ("AECA") generally prohibits, without the
6 appropriate license, the export of defense articles and defense services, which are
7 designated by the President. *See* 22 U.S.C. § 2778(b)(2). The AECA provides for
8 criminal penalties for willful violations of the Act. *See* 22 U.S.C. § 2278(c).

9 2. The Department of State, exercising for the President the above authority
10 under the AECA, has promulgated the International Traffic in Arms Regulations
11 ("ITAR"), 22 C.F.R. § 120.1 *et seq.* These regulations include the Munitions List, which
12 consists of categories of defense articles and services that cannot be exported without a
13 license issued by the Department of State's Directorate of Defense Trade Controls
14 ("DDTC"). *See* 22 C.F.R. §§ 121.1, 123.1, 127.1.

15 3. Category I of the Munitions List includes firearms and their components.
16 As a result, the export of firearms and/or their components generally requires an export
17 license issued by the DDTC.

18 4. Title 15, Code of Federal Regulations, Section 30.6 provides that a shipper
19 exporting items must provide the accurate value and description of the items that were
20 shipped.

21 **B. Manner and Means of the Conspiracy**

22 5. It was part of the conspiracy that PAUL STUART BRUNT, RAWND
23 KHALEEL ALDALAWI, and other persons known and unknown, purchased a variety of
24 firearms and vehicles.

25 6. It was part of the conspiracy that PAUL STUART BRUNT, RAWND
26 KHALEEL ALDALAWI, and other persons known and unknown, plotted to hide the
27 firearms in the vehicles for the purpose of smuggling the firearms to Kurdish forces in
28 Iraq.

7. It was part of the conspiracy that PAUL STUART BRUNT, RAWND KHALEEL ALDALAWI, and other persons known and unknown, completed Customs forms that falsely described the exports as containing only vehicles.

8. It was part of the conspiracy that PAUL STUART BRUNT, RAWND KHALEEL ALDALAWI, and other persons known and unknown, exported the hidden firearms on multiple occasions, with the intention that they be given to Kurdish forces in Iraq.

C. Overt Acts in Furtherance of the Conspiracy

9. During and in furtherance of the conspiracy, within the Western District of Washington and elsewhere, one or more of the conspirators committed one or more of the following overt acts, among others:

a. On April 14, 2017, PAUL BRUNT purchased a Sig Sauer pistol, model 1911, .45 caliber, at a gun show in Monroe, Washington, for the purpose of later attempting to export the firearm to Kurdish forces in Iraq without the required export license.

All in violation of Title 18, United States Code, Section 371. And the complainant states that this Complaint is based on the following information:

I, Shad Severson, being first duly sworn on oath, depose and say:

INTRODUCTION

10. I am a Special Agent with the U.S. Department of Homeland Security ("DHS"), Homeland Security Investigations ("HSI"). I have been employed as a Special Agent with the DHS or a predecessor agency for approximately fifteen years. I am currently assigned to the Office of the Special Agent in Charge, Seattle, Washington. I have worked in groups assigned to investigate money laundering and bulk cash smuggling, drug trafficking, and matters involving internal affairs such as corruption and fraud. I am currently assigned to the Counter-Proliferation Investigations ("CPI") Group, where I investigate cases involving the illegal exportation of weapons and other items from the United States.

11. While working for DHS, I have been trained in, among other things, criminal investigative techniques and export-control investigations. I have received considerable training and have personal experience as a lead investigator with identifying the techniques, methods, and procedures employed by groups, organizations, companies, corporations, and individuals to export or attempt to export goods and commodities in violation of U.S. law. I have received formal training at the Federal Law Enforcement Training Center in Glynco, Georgia. Based on my training and experience, I am familiar with the manner in which individuals illegally acquire and export controlled merchandise from the United States to foreign countries.

12. As outlined below, there is probable cause to believe that PAUL STUART BRUNT and RAWND KHALEEL ALDALAWI engaged in a scheme to export firearms from the United States to Iraq, via Turkey, that were intended for Kurdish fighters in northern Iraq, without a required export license.

SUMMARY OF PROBABLE CAUSE

A. The Recent Seizure

13. On November 27, 2017, the U.S. Government was notified that Turkish authorities in Mersin had seized a shipment of undeclared firearms concealed within two vehicles. The vehicles were shipped from the Port of Seattle, via sea container, to Mersin, Turkey. On November 28, 2017, HSI Seattle received documentation related to the shipment, to include the Electronic Export Information ("EEI")¹ filed for the shipment and the corresponding Sea Waybill.²

14. According to a review of the EEI, PAUL BRUNT was identified as the U.S. Principal Party (*i.e.*, the exporter). The EEI listed the ultimate consignee as AKMAR ULUS. NAK. SAN. VE TIC., Camiserif Mah. Cemalpasa Cad, Yuksel Apt.

¹ EEI is the export data that generally must be filed either by the exporter or the freight forwarder with U.S. Customs whenever the export exceeds \$2,500, or if the goods require an export license.

² A Sea Waybill is a document that reflects a contract of carriage and receipt of the goods being transported.

1 Kat: 4, No: 11, Akdenz-Mersin, Turkey. The EEI stated that the export date was
2 September 14, 2017; the EEI was filed on September 6, 2017. The forwarding agent was
3 identified as Atlantic Express Corp, 7751 W. 88th Street, Bridgeview, IL 60455. The
4 EEI further indicated that the shipment consisted of two used vehicles, which were
5 containerized. The vehicles were identified as a 2016 Ford Mustang, VIN
6 1FA6P8AM0G5292936, and a 2016 Chrysler 200, VIN 1C3CCCAB7GN119865; both
7 vehicles were listed as requiring no export license.

8 15. A review of the Sea Waybill identified the shipper as Atlantic Express
9 Corp. The consignee name and address on the Sea Waybill revealed the same
10 information as the EEI. Additionally, the description of the vehicles shipped, to include
11 the VINs, were also consistent with those listed on the EEI.

12 16. On December 13, 2017, investigators obtained records from Patterson Kia
13 of Arlington, TX, related to the purchase of the Ford Mustang vehicle identified by
14 Turkish Customs, which contained the seized firearms. According to the records, the
15 purchaser of the 2016 Ford Mustang, bearing VIN 1FA6P8AM0G5292936, was
16 identified as PAUL BRUNT. The purchase records indicated the sale occurred on May 1,
17 2017, and the vehicle was paid for by wire transfer in the amount of \$18,746.14.

18 17. On December 14, 2017, investigators obtained records from Premier
19 Chrysler Jeep of Placentia, CA, related to the purchase of the Chrysler 200 vehicle, which
20 was the other vehicle identified by Turkish Customs as containing the seized firearms.
21 According to the records, the purchaser of the 2016 Chrysler 200 vehicle, bearing VIN
22 1C3CCCAB7GN119865, was identified as PAUL BRUNT. The purchase records
23 indicated the sale occurred on July 8, 2017, and the vehicle was paid for by a trade-in of a
24 2015 Chrysler 300 vehicle and cash in the amount of \$2,300.

25 18. On December 19, 2017, investigators obtained records from Atlantic
26 Express Corp related to the exportation of the seized vehicles. According to Atlantic
27 Express Corp, BRUNT interacted with the Seattle branch of Atlantic Express Corp, in
28 person, to facilitate the shipment. The Seattle office was identified as Pacific Atlantic

Express Corp, 13008 142nd Ave East, Orting, WA 98360. The documents provided by Atlantic Express Corp included the EEI, Bill of Lading, Conditional Delivery Agreement, Master Bill of Lading, Dock Receipt, copies of the vehicle titles, a copy of BRUNT's passport and driver's license, and a signed Limited Power of Attorney/Authorization Letter. The Limited Power of Attorney/Authorization Letter, which was signed by BRUNT and dated June 16, 2017, authorized Pacific Atlantic Express Corp. to act as a "designated agent" to export vehicles from the U.S. Additionally, BRUNT provided Pacific Atlantic Express Corp with a typed document/note containing the following contact information:

Owner (Shipper) – Paul Brunt (Paul Brunt LLC)
 Contact: Paul Brunt
 Address: 3457 108th Ave SE Bellevue, WA 98004
 Phone: 425 761-7772 email: paulbrunt2@gmail.com

TRANSPORT COMPANY – TURKEY TO KURDISTAN (IRAQ)
 Company: Akmar Ulus Nak. San. Ve. Tic. Ltd. Sti.
 Address: Camiserif Mah
 Cemalpasa Cad. Yuksel Apt. Kat: 4 No. 11
 Akdeniz-Mersin, Turkey Zip Code: 33060
 Tex number: 0320280728
 Tel: +90 324 238 2052-53
 Fax: +90 324 238 2055
 Email: farukakdag@akmarnak.com

Import Co. (IRAQ) : Oneil Co.
 100m street
 Besides the Customs Directorate
 Erbil, IRAQ
 License # - 6514
 Phone: 964 750 447 18 86
 Email: Oneilcarscompany@yahoo.com
 Buyer Information: (Iraq) Saif Omer Khaili
 Street 100m
 Erbil, Iraq
 Phone: 964 750 483 32 34 (473 23 82)
 Email: Saifomer680@yahoo.com

B. BRUNT's Firearms Purchases

19. On November 29, 2017, Special Agent (SA) Claudia Grigore, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) conducted a query to determine whether any Seattle-area dealers holding a Federal Firearms License (FFL) had reported multiple gun sales for BRUNT. The query identified eight incidents, yielding a total of forty three firearms, beginning on October 5, 2016, and as recent as August 3, 2017. For all eight purchases, the purchaser was identified as:

Paul Stuart Brunt
3457 108th Avenue Southeast (i.e., the SUBJECT PREMISES)
Bellevue, WA 98004

As for the details of the eight purchases:

20. First, on October 5, 2016, BRUNT purchased fifteen firearms from LC Sports, 5925 156th Street SE, Snohomish, WA 98296. The firearms were identified by the following make, model and serial numbers:

Glock 17GEN4; ABWG171
Glock 21GEN3; BBLX560
Colt; CJ58608
Smith & Wesson; FXX6888
HS Products (IM Metal) XDM; MG427275
Armscor of the Philippines (Squires Bingham) 1911A1; RIA1481854
Colt 1991A1; 2889505
Smith & Wesson M&P 9; HNB22917
Glock 19GEN3; BCMW865
Smith & Wesson; UFA2979
Colt Gold Cup Trophy; GCT48811
Sig Sauer 1911 STX; 54B130611
Taurus PT92; TIR51215
Glock 19GEN4; BCWF463
Glock 17GEN3; BCPA231

21. Second, on May 6, 2017, BRUNT purchased five firearms from Washington Military Depot, 20015 Mountain Hwy E, Spanaway, WA. The firearms were identified by the following make, model and serial numbers:

Colt 1991A1; 2934123

1 Armscor of the Philippines; M1911-A1
2 Smith & Wesson M&P 45; HNK1971
3 Glock 17GEN4; BEGM344
4 Ruger SR1911; 671-53641

5 22. Third, on May 8, 2017, BRUNT purchased five firearms from Ben's Loan
6 Pawnshop, 1005 S. 2nd Street, Renton, WA. The firearms were identified by the
7 following make, model and serial numbers:

8 Magnum Research Desert Eagle; DK0034825
9 Colt Government; CV43663
10 Glock 41GEN4; BAGA875
11 Glock 40GEN4; BDGM267
12 Wesson Arms RZ-45 Heritage; 1606136

13 23. Fourth, on June 3, 2017, BRUNT purchased three firearms from LC Sports
14 in Snohomish. The firearms were identified by the following make, model and serial
15 numbers:

16 Sig Sauer 1911 C3; 54B151195
17 New Frontier Armory; EP06163
18 Walther Colt Government; WD036649

19 24. Fifth, on June 10, 2017, BRUNT purchased four firearms from Ben's Loan
20 Pawnshop in Renton. The firearms were identified by the following make, model and
21 serial numbers:

22 Smith & Wesson M&P 40; NAV8182
23 Beretta, Pietro APX; A010414X
24 Sig Sauer P320 X-Five; 58B235271
25 Springfield Armory 1911A1; NM498910

26 25. Sixth, on June 15, 2017, BRUNT purchased four firearms from Rehv Arms,
27 27623 Covington Way SE, Unit 2, Covington, WA 98042. The firearms were identified
28 by the following make, model and serial numbers:

Smith & Wesson M&P 9 Shield; HXP4127
CZ (Ceska Zbrojovka); C199252
CZ; C148842

1 Smith & Wesson M&P M2.0; HWN2245

2 26. Seventh, on July 31, 2017, BRUNT purchased five firearms from Verle's
3 LLC, 741 West Golden Pheasant Road, Shelton, WA. The firearms were identified by
4 the following make, model and serial numbers:

5 Armscor of the Philippines Citadel; CIT024705
6 Metro Arms Corporation American Classic; A12-06348
7 Remington Arms Company; RHN63853A
8 Ruger SR9; 337-12423
9 Ruger SR40; 342-99201

10 27. Eighth, on August 3, 2017, BRUNT purchased two firearms from Ben's
11 Loan Pawnshop in Renton. The firearms were identified by the following make, model
12 and serial numbers:

13 Glock 22GEN4; BBXG967
14 Smith & Wesson M&P M2.0; NAX6374

15 28. Investigators conducted a query of the Turkish gun seizure in open source
16 databases and identified a video from a Turkish media source. A review of the video
17 showed one of the seized guns, and close examination of the still video identified the gun
18 as having a serial number of 54B155779. On January 12, 2018, SA Grigore confirmed
19 through the ATF National Tracing Center that the serial number belonged to a Sig Sauer
20 pistol, model 1911, .45 caliber, which was purchased by PAUL BRUNT on April 14,
21 2017, at a gun show in Monroe, Washington. Additionally, the pistol was part of a
22 multiple sale transaction that included seven total handguns, and it was not reported
23 appropriately by the FFL. Therefore, the seven guns did not appear in the previous query
24 conducted by SA Grigore for multiple firearm purchases. The other six firearms
25 purchased were identified by the following make, model and serial numbers:

26 Springfield Armory Pistol XDS 45; S4127084
27 Armscor Pistol RI1911; RIA793914
28 Sig Sauer 1911; 54B104691
Walther PPQ; FCG1036
HK Pistol USP45; 25-151970DE

1 Armscor Pistol RI Tactical 1911; RIA1808109

2 **C. The Prior Export**

3
4 29. Investigators conducted queries of U.S. export records for PAUL BRUNT.
5 The queries identified one previous shipment on February 23, 2017. According to export
6 records for that shipment, PAUL BRUNT LLC was identified as the exporter. The
7 ultimate consignee was identified as Oneil Co., 100M Street, Erbil, 44001, Iraq. The
8 forwarding agent was identified as GEFCO Forwarding USA, 1055 Stevenson Court,
9 Unit 105W, Roselle, IL 60172. The records further indicated that the shipment consisted
10 of one used vehicle, which was described as a 2015 Chrysler, VIN
11 1C3CCCAB6FN607302.

12 30. Further queries of U.S. export records identified two additional shipments
13 on February 23, 2017, that appeared related to this shipment. Both of the two additional
14 shipments indicated the same ultimate consignee and forwarding agent. According to
15 export records for the first of those two shipments, a particular individual was identified
16 as the exporter; he listed his address as BRUNT's residence. The exporter for the second
17 shipment was identified as Rawnd Khaleel. The export records further indicated the first
18 shipment consisted of one used vehicle, which was described as a 2015 Mitsubishi, VIN
19 ML32A3HJ1FH032697; the second shipment consisted of one used vehicle, which was
20 described as a 2015 Dodge Charger, VIN 2C3CDXBG4FH835872.

21 31. As discussed below, Rawnd Khaleel, the person listed as the exporter for
22 the second shipment, has also been associated with the name "RAWND ALDALAWI."
23 Investigators conducted a search of "RAWND ALDALAWI" in law enforcement
24 databases. Investigators learned that a B2 tourist visa had been issued for ALDALAWI,
25 for June 21, 2016, through June 19, 2017.

26 32. Additional queries in DHS databases identified a FinCEN8300 report filed
27 in the name of RAWND KAHALEEL for a cash payment made in excess of \$10,000
28 (\$15,884). The report, which was filed on December 13, 2016, related to the purchase of

1 a 2015 Dodge Charger vehicle bearing VIN 2C3CDXBG4FH835872, which was the
2 same vehicle shipped by KHALEEL on February 23, 2017, to Oneil CO. in Iraq. The
3 report was filed by Bob Hall Honda in Yakima, WA.

4 33. The FinCEN8300 report identified KHALEEL as having an Iraqi passport
5 number of A7192015, which revealed an address of 45610 Ahrawany, Erbil, Iraq. The
6 date of birth and passport number indicated for KHALEEL on the report are consistent
7 with those identified for Rawnd (Khaleel) Aldalawi. Further queries in DHS databases
8 also identified several FinCEN8300 reports filed in BRUNT's name for cash payments
9 made in excess of \$10,000. One of these reports, which was filed on November 26,
10 2016, related to the purchase of a 2015 Chrysler 200 vehicle bearing VIN
11 1C3CCCAB6FN607302, which was the same vehicle shipped by PAUL BRUNT LLC on
12 February 23, 2017, to Oneil CO. in Iraq.

13 **D. The Interview of BRUNT**

14 34. On January 18, 2018, investigators interviewed PAUL BRUNT. BRUNT
15 waived his *Miranda* Rights and agreed to answer questions from investigators. BRUNT
16 stated that, sometime in approximately late 2016, RAWND ALDALAWI and another
17 individual approached him about helping them purchase vehicles in the U.S. to ship to
18 Iraq.³

19 35. BRUNT explained that, approximately three or four weeks after the initial
20 discussion, ALDALAWI and the other individual asked him if they could send weapons
21 with the cars. BRUNT stated that they offered him \$5,000 to do it and explained they
22 specifically requested new guns, which, according to ALDALAWI and the other
23 individual, would be going directly to the Kurdistan area in Iraq for the Kurdish Army.
24
25

26 ³ Throughout the interview, the timeframe of this discussion varied; however, BRUNT acknowledged later in the
27 interview the discussion likely occurred around October 2016. This timeframe is consistent with previously
28 obtained firearm purchase records and travel records for ALDALAWI and the other individual mentioned by
BRUNT as being part of the scheme.)

1 36. BRUNT stated he agreed to the scheme. He said he purchased all of the
2 guns, and explained that the other individual provided him with cash to purchase them.
3 BRUNT added that he communicated exclusively with the other individual; however,
4 BRUNT believed ALDALAWI's family funded the purchase of the guns and vehicles.

5 37. BRUNT stated that the first shipment, which occurred in approximately
6 February 2017, consisted of approximately 30 guns divided among three vehicles.
7 BRUNT explained that he, ALDALAWI, and the other individual each purchased a
8 vehicle; however, he was not involved in packing the guns into the vehicles. BRUNT
9 stated that, according to ALDALAWI and the other individual, the guns were wrapped in
10 black tape and placed in the door cavities, or other cavities, of the vehicles. BRUNT
11 explained that ALDALAWI and the other individual both departed for Iraq before the
12 vehicles were shipped. BRUNT recalled dropping off the vehicles, loaded with the guns,
13 at the freight forwarder after ALDALAWI and the other individual traveled to Iraq.

14 38. BRUNT stated that the second shipment, which occurred in September
15 2017 and was subsequently seized in Turkey, consisted of approximately 47 guns divided
16 between two vehicles. BRUNT stated he coordinated the second shipment exclusively
17 with ALDALAWI, as the other individual did not return from Iraq with ALDALAWI.
18 BRUNT stated ALDALAWI returned to Seattle from Iraq a few months after he
19 departed. (Previously obtained travel records revealed ALDALAWI returned on
20 February 28, 2017.) BRUNT explained that he purchased both vehicles, but he was again
21 not involved in packing the guns into the vehicles. BRUNT stated he received two or
22 three wire transfers from ALDALAWI's brother in Iraq, totaling approximately
23 \$120,000, for the purchase of the guns, the vehicles, and the fees associated with the
24 export.

25 39. BRUNT stated he was offered \$10,000 for the second shipment. BRUNT
26 explained he took \$5,000 for himself out of the \$120,000, since he was never paid for the
27 first shipment. BRUNT stated he then took the \$10,000 they offered him for the second
28

1 shipment and used the remainder of the money to purchase the guns, the cars, and pay for
2 shipping the container.

3 40. BRUNT stated he did not research any export rules and regulations;
4 however, he knew it was likely illegal to ship firearms from the United States without a
5 license. Moreover, BRUNT acknowledged that, based on how ALDALAWI and the
6 other individual had explained how they wrapped the guns and placed them in the door
7 cavities of the car, the guns were not being shipped legally.

8 41. BRUNT reviewed a copy of a Turkish media video obtained by
9 investigators in open source databases, which documented the recent seizure of the guns
10 by Turkish authorities. BRUNT specifically reviewed the images of the vehicles in the
11 video and stated "those look like the cars."

12 **E. The Interview of ALDALAWI**

13 42. On January 18, 2018, investigators interviewed ALDALAWI at the
14 Tukwila Processing Center. The interview was conducted in Arabic using the assistance
15 of a certified interpreter. ALDALAWI signed a *Miranda* waiver of rights form, which
16 was verbally translated from English to Arabic.

17 43. ALDALAWI said that he had he was the one who put the guns in the cars,
18 that he shipped vehicles with BRUNT, and that he got caught the second time around.
19 He also acknowledged calling the port to inquire about the seized shipment in Turkey.

20 44. When asked how many guns ALDALAWI put in the first shipment, he
21 stated he thought it was about 25 guns, but acknowledged that number could have been
22 between 25 and 30 total guns. ALDALAWI confirmed he put the guns inside the
23 vehicles' door cavities and wrapped the guns up. ALDALAWI confirmed he divided the
24 guns, whether 25 or 30, among the three vehicles shipped.

25 45. ALDALAWI explained he has family who is part of the Peshmerga
26 military in Kurdistan. ALDALAWI stated the Iraqi Government will not accept any
27 weapons to go to Peshmerga and that his objective was to get these weapons to the
28 Peshmerga forces in a secure and legal way. After being confronted with the fact that

1 wrapping the guns up did not indicate he was proceeding in a legal manner, ALDALAWI
2 stated, "We are agreeing, I am agreeing that this was not quite legal here, but for the Iraqi
3 arrangement, it is legal." ALDALAWI added he did not know the law in the United
4 States and reiterated he was sure the Iraqi government would never allow weapons to go
5 into Peshmerga, but he was not sure about the agreement between Peshmerga and the
6 United States.

7 46. ALDALAWI stated his objective was to buy the weapons legally, but make
8 sure they arrived safely. ALDALAWI said that the Iraqi Government did nothing to help
9 the Peshmerga people when ISIS came. ALDALAWI stated, "It may be that I did
10 something without knowing the legalities of it. We hope that we get a license between
11 government and government. So the Ministry in Peshmerga has given us such license,
12 it's the United States that needs to give us this."

13 47. ALDALAWI stated he and another individual explained the situation to
14 BRUNT and that BRUNT was understanding. ALDALAWI said that he divided up the
15 weapons, not BRUNT, but confirmed that BRUNT purchased the guns. ALDALAWI
16 stated that BRUNT would bring the guns to ALDALAWI'S apartment and that
17 ALDALAWI would put them directly into the cars.

18 48. ALDALAWI said that money was transferred to BRUNT's account by his
19 brother in Iraq. ALDALAWI confirmed both shipments went to his brother at ONeil
20 company. ALDALAWI stated his brother gets the cars with the weapons inside and
21 takes them to the Peshmerga Ministry.

22 //

23 //

24 //

25

26

27

28

CONCLUSION

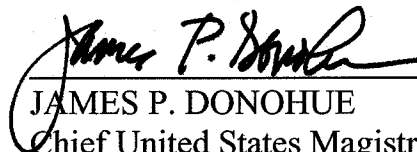
49. Based on the above facts, I respectfully submit that there is probable cause to believe that PAUL STUART BRUNT and RAWND KHALEEL ALDALAWI did conspire to violate the AECA by exporting firearms to Iraq without a license, in violation of Title 18, United States Code, Section 371.



Shad Severson, Complainant
Special Agent, HSI

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe the Defendants committed the offense set forth in the Complaint.

Dated this 23rd day of January, 2018.



JAMES P. DONOHUE
Chief United States Magistrate Judge